



AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

Greg Anthony WHYTE )

Case No. 8:25-MJ-004 (GLF)

Defendants. )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 13, 2025, in the county of Franklin in the Northern District of New York the defendants violated:

*Code Section*  
8 U.S.C. § 1326(a)

*Offense Description*

Greg Anthony WHYTE, an alien, native and citizen of Jamaica, being an alien who has been denied admission, excluded, deported, or removed, or has departed the United States while an order of exclusion, deportation, or removal is outstanding, entered and was thereafter found in the United States without the Attorney General of the United States, or his successor, the Secretary of Homeland Security, having expressly consented to his reapplication for admission to the United States.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

*Complainant's signature*

Benjamin LaBaff, U.S. Border Patrol Agent

*Printed name and title*

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: January 14, 2025

*Judge's signature*

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

*Printed name and title*

*Continuation Sheet, United States v. Greg Anthony WHYTE*

On January 13, 2025, Massena Border Patrol Agents received information from St. Regis Mohawk Tribal Police Department that a subject was walking on Raquette Point Rd. that had possibly entered the United States illegally from the ferry docks on Raquette Point Rd., via the Akwesasne Mohawk Reservation. Shortly thereafter, Massena Border Patrol Agents encountered Greg Anthony WHYTE, a citizen of Jamaica, who was walking on foot on Raquette Point Road, on the Akwesasne Mohawk Reservation.

Massena Border Patrol Agents were able to follow WHYTE's footprints, that led back to the ice near the shore of the ferry docks, which then led into the woods on the south side of Raquette Point Road. The area where WHYTE was encountered has seen an increase in illegal entries over the past month. WHYTE readily admitted to being in the United States illegally.

Upon arrival at the Border Patrol station, biographical information and fingerprints were entered into Department of Homeland Security databases for the subject. Record checks revealed that WHYTE was ordered removed from the United States on or about June 4, 1998, and that he was deported from the United States on or about January 27, 2011 from Miami, Florida. He was subsequently removed from the United States again on January 26, 2012 from New Orleans, LA. He was subsequently removed from the United States again on or about January 28, 2016 from New Orleans, LA.

WHYTE did not obtain the express consent of the Attorney General of the United States, or his successor, the Secretary of Homeland Security, to reapply for admission to the United States.